## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

| LAURA VAN THOLEN,            | ) |                 |                 |
|------------------------------|---|-----------------|-----------------|
| Plaintiff,                   | ) |                 |                 |
|                              | ) | Case No.        | 08 C 1082       |
| vs.                          | ) |                 |                 |
|                              | ) | Judge Gettleman |                 |
| CUTTING EDGE MILLWORK, INC., | ) |                 |                 |
|                              | ) | Magistrate J    | Judge Schenkier |
| Defendant                    | ) |                 |                 |

## <u>DEFENDANT, CUTTING EDGE MILLWORK, INC.'S</u> <u>MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD</u>

NOW COMES Defendant, Cutting Edge Millwork, Inc., ("Cutting Edge") by and though its counsel of record, Garelli & Grogan, and for its Motion for an Extension of Time to Answer or Otherwise Plead, states as follows:

- 1. Defendant was served with the Complaint on March 3, 2008.
- 2. Defendant's counsel has just been retained and is now in possession of the Complaint in this matter.
- 3. Counsel is in need of additional time to file an Answer or otherwise plead to this cause of action. Defendant requests an additional 30 days in which to Answer or otherwise plead.
  - 4. This request is made in the interest of justice and not for the purpose of delay.
- 5. There is not yet a case management conference scheduled in this case. The additional time will not prejudice the Plaintiff in any manner.

WHEREFORE, Defendant, Cutting Edge Millwork, Inc., by and through counsel, respectfully requests this Court grant Defendant an additional 30 days from the date of entry of the Order within which to Answer or otherwise plead to Plaintiff's Complaint.

Respectfully submitted,

CUTTING EDGE MILLWORK, INC.

By: /s/ Amy Galvin Grogan
One of Its Attorneys

Amy Galvin Grogan (ARDC# 6229364) Michael R. Hauert, Jr. (ARDC# 6286355) GARELLI & GROGAN 340 W. Butterfield Rd., Suite 2A Elmhurst, IL 60126 630/833-5533